



Grace Project International School.

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Safeguarding and Child Protection Policy

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## 1. Policy

### Policy statement

The School recognises its statutory and moral responsibilities to safeguard and protect the welfare of all the students in its care. We endeavor to provide a safe, supportive and positive environment in which students can discover their God-given identity and flourish.

### Scope

This policy and any associated procedures apply to both the **Pre-school and Primary School**.

### Definition

Safeguarding and promoting the welfare of children is defined for statutory purposes as: protecting children from maltreatment; preventing impairment of children's health or development; ensuring children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes both inside and outside school (contextual safeguarding).

### Terminology

In this policy, '**Board**' refers to the Board of Governors; '**School**' refers to both the **Preschool** and **Primary School** either separately or jointly depending on the context; '**Director**' refers to the School's Executive Director; '**Principal**' refers to both the Head of the **Preschool** and the Head of the **Primary**; '**DSL**' refers to the Designated Safeguarding Lead (there is a DSL and a deputy in each of the two Schools); '**Staff**' refers to all those working for or on behalf of the School (including staff working on behalf of third party contractors), full or part-time, permanent or temporary, in either paid or voluntary capacities, and governors; and '**Parents**' includes one or both parents, and legal or education guardians.

### Regulatory framework

This policy takes account of all relevant legislation. The following documentation has been consulted in the compilation of this policy:

#### Ugandan law

The Constitution of **Uganda THE CHILDREN (AMENDMENT) ACT, 2016**  
**The 2008 Education Act**  
The Penal Code

#### UK law

Keeping Children Safe in Education (September 2021)  
What to do if you're worried a child is being abused (March 2015)  
Working Together to Safeguard Children (December 2020)  
Prevent Duty Guidance: for England and Wales (July 2015)  
Relationships and sex education (RSE) and health education (June 2019)

In particular, it is based on the United Nations Convention on the Rights of the Child (CRC) 1989 and the African Charter on the Rights and Welfare of the Child (ACRWC) 1999.

This policy also acknowledges 'Standards for British Schools Overseas' (March 2018) and the accompanying cited legislation and guidance.

## Review

This policy will be subject to annual review by the Board unless an incident, guidance or new legislation requires an earlier date of review.

## 2 Roles and responsibilities

### The Board

The Board ensures that the Safeguarding and Child Protection Policy and its associated procedures are compliant, up-to-date and effective, and that there is a nominated Safeguarding Children Governor (SCG) who reports formally to the Board annually. The SCG is required to have undergone safeguarding training.

The Board are responsible for ensuring that all staff have understood their Safeguarding Responsibilities as outlined in Keeping Children Safe in Education (September 2021). In addition to this, they are responsible for the strategic leadership of Safeguarding arrangements, which will always operate with the best interests of the child at heart.

The Board also ensures that the School operates safer recruitment procedures, that there is an effective training program for all staff, and that the Safeguarding and Child Protection Policy and associated procedures are reviewed annually.

### The Principal

The **Principal** ensures that:

- The Safeguarding and Child Protection Policy and its associated procedures are implemented
- There is a DSL and a deputy appointed and they are properly trained
- There is sufficient time, support and resources for the DSL to carry out his/her duties
- Safeguarding is integral to the curriculum
- All staff feel able to raise concerns about poor or unsafe practices and such concerns are handled sensitively
- All legal and regulatory requirements are met
- All staff are aware of the process for reporting a concern
- He/She works with the DSL in individual cases to decide if further action is needed

### The DSLs

The DSLs are members of the Senior Leadership team and have ultimate responsibility for all safeguarding and child protection matters in the Schools. This includes acting as a support and

source of expertise for staff, ensuring that relevant policies and procedures are known and used appropriately, raising awareness and generating discussion of safeguarding issues and concerns among staff and students, coordinating safeguarding planning and action, and liaising with other agencies as necessary.

The DSLs and their deputies have the necessary status and authority to take responsibility for safeguarding matters, including committing resources and, where appropriate, directing other staff. They will be trained. Their responsibilities include:

Ensuring the Safeguarding and Child Protection Policy is regularly reviewed and updated, and is available on the School **Hard** drive and website

Arranging training as necessary and keeping staff up-to-date with regard to child protection procedures; training and updating will always occur as part of the INSET at the start of the academic year, and thereafter as special needs arise.

Managing referrals of abuse, or suspected abuse to relevant authorities as appropriate

Keeping separate and secure records of all concerns. These are used, as requested and appropriate, to assist in the sharing of information when a pupils transfers to another school.

Liaising with the governor responsible for Safeguarding and Child Protection (SCG) and with the **Principal** as necessary

Developing links with other professionals, making referrals if necessary.

Ensuring that when students with child protection plans leave the School, information is passed on to their new schools and, if appropriate, relevant agencies are informed

## The Child

As a school, we consider the safety of a child as paramount and the child's welfare is our number one concern. With this in mind, as a school, we have a duty of care to request information and discuss matters with the wider safeguarding team and, if necessary, outside agencies. Wherever possible, we will work alongside parents in this process. However, there are instances where the needs of the child supersede the wishes of a parent and in these instances our duty of care to the child will override all other considerations.

Contact with parents is essential and wherever possible the school will endeavour to keep more than one emergency contact number for each child.

## The Director

The Director ensures that all prospective employees provide relevant compliance documentation, checks references, manages Disclosure and Barring Service (DBS) or Certificate of Good Conduct (COGC) applications and keeps the Single Central Register. He/she also bears the overall responsibility for safer recruitment.

## The Chaplains and School Counsellor

The Chaplains and School Counsellor play important and unique parts in the pastoral care of students. They work within a well-defined framework of confidentiality and will ensure any issues relating to safeguarding and child protection are passed on to the DSL.

## Staff

All staff have a statutory obligation to provide a safe environment in which students can learn and to be aware of the signs of abuse and neglect. They receive safeguarding training, as well as regular updates from the safeguarding team and will be familiar with the School's Safeguarding and Child Protection Policy and the associated procedures. They are required to sign that they have read and understood the policy and agreed to comply with the requirements therein.

## 3 Principles

There are nine main principles on which this policy is based:

Adopting good practice

Establishing a safe environment in which students can learn and develop

Guidance on interaction with children

Safeguarding staff against accusations of abuse

Ensuring the practice of safer recruitment in checking the suitability of all staff to work with children and young people

Raising awareness of safeguarding issues including mental health and equipping students with the skills needed to keep themselves safe

Developing and implementing procedures for identifying and reporting cases, or suspected cases, of abuse

Supporting students who have been abused, in accordance with an agreed child protection plan

Procedure for dealing with Peer on Peer abuse and Bullying

### 3.1 Adopting good practice

All staff have a responsibility to behave professionally in all their dealings with students and, in particular, with those for whom they have a duty of care. They will adhere to the Staff Code of Conduct and will avoid any behaviour that might be misconstrued. Staff should also be aware of the intimate care procedure, which can be found in the Medical Care Policy. Intimate care can be defined as any care which involves washing, touching or carrying out a procedure to intimate personal areas which most people usually carry out themselves, but what some children are unable to do because of their young age, physical difficulties or other special needs.

To meet and maintain these responsibilities, all staff will:

- Treat students with respect
- Set a good example by conducting themselves appropriately
- Involve students in decisions that affect them where appropriate
- Encourage positive, respectful and safe behavior among students
- Be good listeners
- Be alert to changes in students' behavior and to signs of abuse and neglect
- Recognise that challenging behaviour may be an indicator of abuse
- Ask a student's permission before initiating physical contact such as assisting with dressing, support during PE, demonstrating technique in a music lesson or administering first aid
- Maintain appropriate standards of conversation and interaction between students and avoid the use of sexualised or derogatory language
- Follow the published guidelines with regard to communication with students and the use of social media
- Be aware that the personal and family circumstances of some students lead to an increased risk of abuse
- Apply reasonable force only as a last resort
- Refer all concerns about a student's safety or welfare promptly to the DSL

### 3.2 Establishing a safe environment in which students can learn and develop

In order to ensure students are safe at all times, the School will:

- Support students' development in ways that will foster security, confidence and resilience in every aspect of School life including in the formal curriculum
- Provide an environment in which students feel safe, secure, valued and respected, and feel confident and know how to approach adults if they are in difficulty
- Recognise that staff working in the School who have become involved with a child who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful and upsetting; we will support such staff by providing an opportunity to talk through their anxieties with the DSL and to seek further help. This could be provided by, for example, the Houseparent, Chaplain, or School Counsellor
- All children in **Grace Project International** School are taught about Safeguarding and Child protection; this is done at many stages in the school year through chapels, assemblies and whole school initiatives. Education and training of this nature is provided by pastoral and academic staff and all staff recognise their mandatory responsibilities to educate, share information and encourage safe and effective care for children.

### 3.3 Guidance on interaction with children

It is important to remember that abuse can take on a variety of forms: physical, emotional, sexual and neglect.

All students have the right to be protected. Child abuse is no respecter of class or wealth. People who abuse children do not necessarily look like "abusers". They may be otherwise quite ordinary and respectable.

All adults who have the charge or care of students have a responsibility to ensure that they are not

harmed.

It is vital that the way in which staff conduct themselves when interacting with students minimises the possibility of being accused of misconduct. It is important that staff maintain good practice and care at all times. This is all the more important **because** we endeavour to foster a warm and positive family atmosphere.

In order to protect students from abuse, and staff from accusations of abuse, the natural inclination to comfort and reassure students through physical contact has to be curbed by considered assessment of the situation.

This does not mean that physical contact is never permissible. It does mean that physical contact must operate within limits that both parties understand, and that contact beyond these limits must be a considered response that can be justified if necessary.

Where these limits lie will vary according to the age of the student and the role of the member of staff.

It is not possible to lay down exhaustive rules about what is and is not permissible. However, as a guideline, staff who need to talk to a student privately should do so with both the student and staff member clearly visible by passers-by and preferably with a door open.

It is important for caring adults to understand that certain actions that might seem acceptable to some can be exploited by others with less worthy motives.

### 3.4 Safeguarding staff against accusations of abuse

Opportunities for abuse exist in all schools, especially boarding schools, and in one-to-one situations such as tutorials, music lessons and interviews.

The simplest advice is to try, as far as possible, to avoid being alone with a student. This may prove difficult, especially in a situation where it may be seen as beneficial for a student to have some opportunity to talk one-to-one with an adult. Where possible, it is sensible to involve another student or adult in the meeting. If this is not possible, the meeting should be arranged with others, where possible, within earshot and/or sight and with doors left open.

Excursions out of School **such as field trips**, are times when abuse might occur. Care must be taken to ensure that there are sufficient adults to provide proper supervision and that the gender balance of the adults and students is appropriate.



Staff should be professional in all their dealings with pupils or students in their care. The need to maintain this professional relationship should be considered in interaction with children inside and outside the school day, this includes communication through professional platforms such as teams and email and teachers should lead by example in not communicating in 'unsociable hours'.

Staff should not be in contact with students through social media and should consider each platform as private and adjust such settings appropriately. It is not advisable to use personal phones to photograph students/pupils but if this is absolutely necessary then such photos should be deleted after sharing them with **the admin** team.

### Staff Code of conduct

The Code of conduct sets out the key principles of good conduct and practice for all members of staff and volunteers at **Grace Project International School**. It is intended to guide their judgements and decisions and inform parents, students and the general public of the standards they can expect from **Grace Project International School** employees.

There are clear principles of conduct and practice for staff at **Grace Project International School**, based on the School's **Core Values: Commitment, Excellence, Loving, Servanthood, Faithfulness, Integrity and Commitment**.

### 3.5 Safer recruitment

The School is committed to safer recruitment, ultimate responsibility for which lies with the Board. The **Director and Principal** are responsible for implementing the procedures.

These procedures include checks as to the suitability of staff to have contact with students including DBS and the taking up and checking of references.

### 3.6 Raising awareness and equipping children with skills needed to keep themselves safe

We recognise that because of the day-to-day contact with students, staff are well placed to observe the outward signs of abuse and neglect. All staff have a part to play in protecting students from harm.

The School will therefore:

- Ensure students know that there are adults whom they can approach if they are worried. Students who are deemed to be vulnerable will have a key worker (likely to be a member of the Senior Pastoral Team) in addition to their tutors
- Include opportunities in the curriculum for students to develop the skills they need to recognise and stay safe from abuse and develop their knowledge of safeguarding
- Raise the awareness of all staff of the need to safeguard students and their responsibility to identify and report possible cases of abuse, or suspected abuse and report cases to the DSLs.
- Communicate to staff through staff meetings

Communicate to parents through newsletters  
Ensure all staff know the name of the DSLs and their role  
Ensure that parents have an understanding of the responsibility placed on the School and staff for safeguarding, by setting out obligations in the Parent Handbook and on the School website  
Publish the names of the DSLs clearly

### 3.7 Procedures for reporting abuse

To ensure that the reporting of abuse or the suspicion of abuse is timely and effective, the School will:

Ensure all staff understand their responsibility to be alert to the signs of abuse and neglect, and to refer any concerns to their **supervisors**.

Keep written records of concerns even where there is no need to act on the matter immediately.

Provide a systematic means of monitoring students known to be, or thought to be, at risk of harm, and contribute to the development of action plans

Ensure all records are kept separately from the main student files, in a locked location and in a password-protected database with appropriately limited access

Ensure all staff undergo initial safeguarding training on appointment and further training at least annually

Keep all matters relating to child protection confidential; the Head or DSL will only disclose sensitive information about a student to other members of staff on a need-to-know basis

Ensure all staff are aware that they have a professional responsibility to share information in order to safeguard students and that they cannot promise a student complete confidentiality

The School will abide by the law with regard to safeguarding and child protection. If there is a conflict of interest between responsibilities, the School will always act in the best interests of the student.

### 3.8 Supporting students who have been abused

We recognise that students who have been abused, who witness violence or who live in a violent environment may feel helpless and humiliated, may blame themselves, and may find it difficult to develop and maintain a sense of self-worth. In such circumstances, the School may provide the only stability in their lives.

We also recognise that the behaviour of a student in these circumstances may be normal, or aggressive, or withdrawn. We will ensure any such students are closely monitored and supported, and any concerns are recorded. We will provide continuing support to students in such circumstances when they leave the School by forwarding records, including medical records, under confidential cover to Heads at the students' new schools.

As a school we recognise that mental health issues could be an indicator of abuse and neglect. Effective pastoral support, tutoring, mentoring and student led committees all help identify possible mental health issues and through our School Counsellor and Doctor we establish whether they may lead to a safeguarding concern.

The DSLs and the safeguarding team will work to put the best interests of the child first.

### 3.9 Procedure for dealing with Peer on Peer abuse and Bullying

The school will ensure that staff do not dismiss instances of peer on peer abuse, including sexual violence and sexual harassment as an inevitable part of growing up. Victims will be appropriately supported. Any indication that a child has suffered from peer on peer abuse will be dealt with under the child protection procedures outlined in this policy.

Training is provided to staff about recognising and responding to peer on peer abuse, including raising awareness of the gendered nature of peer abuse, with girls more likely to be victims and boys perpetrators. Consideration will always need to be given to the welfare of both the victim (s) and Perpetrator (s) in these situations.

As a school we take every opportunity to teach and train both staff and teachers in all aspects of peer on peer abuse through PSHE curriculum.

Quick and timely reporting is vital to the management of peer on peer abuse and students are apprised of the lines of communication that are open and who to contact. This is publicised throughout the boarding houses.

As a school we do not take just a reactive response to Peer on Peer abuse but recognise the international scale of the issue and encourage parents to hold us to account on this aspect of our duty to young people in our care.

Within our school we consider

- The different variants of peer on peer abuse within the school

- The makeup of the student body, including specific characteristics that might affect their vulnerability to peer-on-peer abuse such as, for example, gender, age, learning difficulties, special educational needs and/or disabilities, sexual orientation and/or religious belief.

- which of these students are affected, or are more at risk of being affected, by peer-on-peer abuse

- the various sociocultural contexts to which those students are associated including, for example, their peer group

- We monitor incident logs and assess behavioral trends.

#### Sexual Violence and Harassment between children

The school recognises that sexual violence and sexual harassment can occur between two children of any age and sex and that its staff are expected to maintain an attitude of 'it could happen here'. Sexual violence may include rape, assault by penetration or sexual assault. Sexual harassment refers to 'unwanted conduct of a sexual nature' such as comments, sexual taunting or physical behaviour such as deliberately brushing against someone. Online sexual harassment may include non-consensual sharing of sexual images and videos, sexualised online bullying, unwanted sexual comments and messages, and sexual exploitation coercion and threats.

The school will not tolerate sexual violence and sexual harassment and will provide training on how to manage a report of sexual violence or harassment. All decisions will be made on a case by case basis. The school will consider both the victim and perpetrator and any others children and staff involved, offer appropriate support and reassure the victim that he/she is being taken seriously. The wishes of the victim, like in any bullying case, will be taken into consideration when decision making.

#### Sexting and school action

When an incident involving youth produced sexual imagery comes to a schools attention:

The incident should be referred to the DSL as soon as possible  
The DSL should hold an initial review meeting with appropriate school staff  
There should be subsequent interviews with the young people involved (if appropriate)  
Parents should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm  
At any point in the process if there is a concern a young person has been harmed or is at risk of harm appropriate measures should be taken.

#### 4 Social media and Online Safety

Social networking sites such as Facebook, Twitter, WhatsApp, Snapchat and Instagram pose risks in terms of professional integrity and the welfare of students. Staff must not use these sites to contact or communicate with current students.

Unfortunately, some students post information on social networking sites that is inappropriate. Viewing such pages may alter a staff member's judgment of a student. In turn, it may alter a student's perception of a staff member. To comment to students about what has been seen is likely to have an impact on your professional reputation as well as possibly causing distress to the students concerned.

Should a staff member become aware of material about themselves, a colleague, the School, or a student, which is inappropriate, the **Principal** must be informed. They will instruct a member of staff to check the allegations and take the appropriate action. You must not check it out yourself.

Children are informed and educated about the dangers of posting inappropriate photos or text as part of the PSHE curriculum.

##### Online Safety

The School is committed to keeping students safe at all times, especially online. As such, the School employs numerous measures both educational and preventative, to ensure that children are able to be active online in a safe and secure fashion. We provide a careful balance of filtering and monitoring whilst ensuring these restrictions are not unreasonable. There are active measures in place to ensure that relevant staff are alerted to possible breaches in safety.

Please refer to our 'Computer Use Policy' for further details.

## 5 Use of reasonable force and restraining students.

Physical contact with students may be for the purpose of care, instruction, control or restraint. Staff should be able to fully justify resorting to physical contact in any situation, and the nature of the contact should be limited to what is appropriate.

Restraining students should only involve the minimum force necessary to protect them from the risk of harming themselves or others, or inflicting damage to property. Where possible, colleagues should be summoned to assist. Staff should record details of such incidents and pass these to the **Principal**. At no point is it appropriate to hit a student. Use of reasonable force should not be used as a punishment or to search a student. The use of corporal punishment is expressly forbidden.

## 6 Remarks and attachments

Staff should be very careful that the remarks and comments made to students could not be construed as suggestive, inappropriate or demeaning. Negative remarks about a student's physical characteristics or development must not be made.

A staff member should share concerns with a member of the School management team if he/she feels that a student is becoming inappropriately attached to him/her or to another member of staff. A staff member should also consult a management team member if he/she believes that his/her feelings towards a child or young person place him/her at risk of unprofessional behaviour.

## 7 Responding when students disclose abuse

Recipients of a student's disclosure of abuse or neglect have a responsibility to observe, record and report, but not to question and test the evidence. In such circumstances staff will:

- Not guarantee confidentiality
- Listen with care
- Reassure the student that he/she is not to blame
- Not show disbelief, but always take the allegation seriously
- Affirm the student's feelings as expressed
- Avoid being judgmental about the information disclosed
- Avoid a 'mystery' approach
- Avoid an emotive response such as looks of shock etc
- Refer the issue to **your superiors**
- Sign and date notes made

The primary functions of the member of staff are to listen and record and not to interrogate. Any questions should be aimed at obtaining basic information only, and they must be open ended and not leading. There is a real danger of making evidence invalid should police involvement be needed at a later date. These written records will be passed to the **principal**.

## 8 Dealing with allegations against staff (including the Principal, Director, teachers and Volunteers)

The School has procedures for dealing with allegations against staff, heads, director, and

volunteers who work with children that aim to strike a balance between the need to protect children from abuse and the need to protect staff and volunteers from false or unfounded allegations.

### Action summary

All cases of suspected abuse should be given the highest priority. The following course of action should be adhered to:

**LISTEN** to what the student has to say, but remember that you must not ask leading questions or promise confidentiality. You may want to make brief notes during your conversation to aid your memory. Remember not to get distracted. Ensure the student feels that they have your full attention and is being taken seriously

**REPORT** all suspicions immediately to the DSL or to his/her deputy

**RECORD** in detail the circumstances (including the nature and extent of injuries) and the action taken, and pass on to the DSL

**REMEMBER** that it is important to act straightaway

### 8.1 Action in respect of false allegations

If an allegation made by a student is found to be false, the School will:

Refer the matter to the School Counsellor to determine whether the student concerned is in need of help, or may have been abused by someone else

Consider whether any disciplinary action is appropriate, in the rare event that an allegation is shown to have been deliberately invented or malicious

Give to the member of staff or student against whom the allegations were made an account of the circumstances and a letter confirming the conclusion of the matter; the member of staff or student may wish to seek legal advice

Keep securely all records pertaining to the circumstances and investigation

Take all reasonable steps to support the member of staff or student

## 9 Whistleblowing

The School recognises that it needs to provide a mechanism by which all members of staff, including temporary staff and volunteers (paid and unpaid), can bring matters of concern to the attention of the School Executive.

All staff have a responsibility to raise concerns, despite any difficulties that that might pose, particularly if the concern relates to the welfare and safeguarding of students.

Employees must acknowledge their individual responsibilities to bring matters of concern to the attention of senior management and/or relevant agencies. Although this can be difficult, this is particularly important where the welfare of children may be at risk.

All staff are trained to follow the mantra of "Don't think what if I'm wrong - think what if I'm right."

## 10. Safeguarding and Child Protection Framework (SCPF)

The safeguarding and child protection framework includes:

- Safeguarding and Child Protection Policy
- Summary statement to parents
- Safeguarding and child protection training programs
- E-Safety Policy
- Anti-Bullying Policy
- Sexual Harassment Policy
- Use of Images of Children Policy
- Staff Code of Conduct
- Computer use policy**
- Data Protection Privacy Notice Policy
- Relationships Among Students Protocol
- Relationships Between Staff and Students Protocol
- PSHE Curriculum
- Prevent Duty
- Equality and Diversity
- Visitor Policy
- Safer Recruitment Policy

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Compiled by:

Approved by:

Date of review:

Date of next review:

Signed: \_\_\_\_\_

Date: \_\_\_\_\_

## Appendix 1

### Dealing with allegations against staff (including the DSL, Heads, Director, Governors and Volunteers)

#### Introduction

Allegations that a member of staff has abused a student or students either inside the school premises or during a school trip / visit or they have behaved in a way that indicates that they may not be suitable to work with children could be made by:

- parents, guardians or relatives
- the abused student
- other members of staff
- other students
- a third party

An allegation of such seriousness would normally be made directly to the Head; but if another member of staff is told first, they will ensure that both the **Director** and **Principal** are informed immediately.

#### Anonymous Allegations

If the allegation of child abuse is made anonymously and names both a member of staff and a child, the situation will be handled in exactly the same way as if the identity of the person making the allegation was known. Where the allegation names the member of staff but not the child, the member of staff will be interviewed and asked for their version of events. It may be appropriate to establish a mentoring or review programme for that individual, or to provide them with further training. A record will be kept on the individual's personal file.

#### Procedures

The **Director and principal** will respond immediately and sensitively to the legitimate concerns of the victim and his or her family.

They shall undertake to:

- take any allegation of abuse involving a member of staff very seriously
- establish the facts before jumping to any conclusion
- inform the member of staff honestly of the allegation that has been made and advise them to contact **someone for** legal representation for advice and support
- inform the child's parents in confidence, inviting them to maintain confidentiality whilst the investigation takes place.



Where the facts suggest that there may be reasonable grounds for suspecting actual abuse, or grooming of a child, or other criminal behaviour, the **Principal** will always:

- involve the Board of Governors and seek legal representation
- consider suspending the member of staff or volunteer concerned
- seek advice from the **Department of Youth and Children's affairs in the Ministry of Gender, Labour and social Development (Uganda)**

### Support for the student

Our priority is to safeguard the young people in our care. We will give all the support that we can to a student who has been abused. The Head, along with the DSL, will consider how best to support and monitor the student concerned through any process of investigation, liaising closely with parents, guardians, relatives or agencies identified as capable of offering appropriate support strategies.

Under no circumstances should the student be dismissed or expelled from the school pending such an investigation.

### Suspension

Suspension of a member of staff is a neutral act and does not imply that any judgement has been reached about their conduct. Even so, it is a serious step, and the Board of Governors will take legal advice before initiating suspension procedures, and will only suspend a member of staff where:

- there is a serious risk of harm to the child; or
- the allegations are so serious as to constitute grounds for dismissal, if proven; or
- the police are investigating allegations of criminal misconduct

We recognise fully that we have a duty of care towards all our staff, and we will always:

- keep an open mind until a conclusion has been reached
- interview a member of staff before suspending them
- keep the member of staff informed of progress of the investigation

### Alternatives to suspension

We will always consider whether an alternative to suspension might be appropriate.

Possibilities include:

- sending the member of staff on leave
- giving the member of staff non-contact duties
- ensuring a second adult is always present in the classroom when they teach

The resignation of a member of staff or volunteer mid-way through an investigation would not lead to the investigation being abandoned. Every investigation into allegations of child abuse will be

completed. We will not entertain any compromise agreements suggested by a member of staff in which they agree to resign if the School agrees not to pursue any disciplinary action.

### Length of investigatory process

The School recognises that everyone's interests are served by completing any investigatory process as swiftly as possible. The Board of Governors will aim to spend as little time as is compatible with fair and impartial processes on the investigatory process. Every investigation will be completed within one month.

### Low Level Concerns

Keeping Children Safe in Education September 2021, Part 4, includes specific advice about the reporting of low-level concerns. If the concern does not meet the threshold to report to the LADO (in a UK context) or is inconsistent with the staff code of conduct, including inappropriate conduct outside of school, it is considered a 'low-level' concern and should be reported to a section DDSL or DSL. The term low-level does not mean that it is insignificant, it means the behaviour towards the child does not meet the harms threshold. (KCSIE 2021)

Examples of such behaviour could include, but are not limited to:

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone without reason;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating or offensive language.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

It is crucial that any such concerns, including those which do not meet the harm threshold (see Part Four - Section one KCSIE September 2021), are shared responsibly and with the right person, and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of schools and colleges from potential false allegations or misunderstandings.

All low-level concerns should be recorded on the Low-Level Concern form by the DSL or a DDSL and include details of the concern and action taken and the name of the person raising the concern should be noted. If the person raising the concern wishes to remain anonymous then that should be respected as far as reasonably possible. The DSL or DDSL will investigate the concern to determine what further action may need to be taken by collecting relevant information, including speaking with the person raising the concern, speaking with the individual involved and any witnesses.

The DSL/DDSL will present their findings to the Head. These will be signed off and stored by the Head if it is agreed that the concern is low-level. Records will be retained until the individual leaves their employment.

If the concern has been raised via a third party, the Head will collect as much evidence as possible by speaking with the person raising the concern, the individual involved and any witnesses to determine what further action may need to be taken. The information will be recorded with the rationale for

the decisions and action taken which may include being considered to meet the harms threshold. These records should be reviewed to identify patterns of behaviour, issues within the school, any training required etc.

In some circumstances an allegation may be made against an individual not directly employed by the School, where its disciplinary procedures do not fully apply, such as a contractor or volunteer. Whilst the School is not the employer, the School recognises its responsibility to ensure that the allegation is dealt with properly, in conjunction with the Agency where applicable. In no circumstances will the School cease to use a contractor or volunteer due to safeguarding concerns, without finding out the facts and liaising with the relevant authority to determine a suitable outcome. The School will use the guidance given in KCSIE Part 4 to managing such allegations.

If such a concern is about the DSL then it should be reported to the Head.

If a report is determined to be unsubstantiated, unfounded, false or malicious, the DSL should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. If the report is shown to be deliberately invented or malicious, the School will consider whether any disciplinary action is appropriate against the individual who made it under the School's Code of Conduct.

The School will work to ensure it creates an environment where staff are encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

## References

The School will only provide substantiated safeguarding allegations in references. Low level concerns will not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance. It follows that a low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) should not be referred to in a reference. However, where a low-level concern (or group of concerns) has met the threshold for referral to the Board of Governors and found to be substantiated, it should be referred to in a reference.

## Referral of outcomes

In the case of staff recruited from the UK or staff that may work in the UK in the future, we have a statutory legal duty to refer an individual, where there is risk that they may harm, or has caused harm to children, to the Independent Safeguarding Authority (ISA) & the Disclosure and Barring Service (DBS) within one month of the individual's dismissal or resignation because they have been considered unsuitable to work with children. Reports concerning members of staff, volunteers, contractors or students are made by the Head. If the Head is involved, the report is made by the **Directors**. In the case of foreign nationals, the report will be made to their embassy. For **Ugandan** nationals, the report will be made to the Ministry of Education.

A referral would be made when termination was a result in the following circumstances:

- Unacceptable professional conduct
- Conduct that may bring the profession into disrepute
- A conviction, at any time, for a relevant offence.

In the event of an allegation against teachers, the School will make every effort to maintain confidentiality and guard against unwanted publicity.

### Recording allegations of abuse

We will record all allegations of abuse, and our subsequent actions, including any disciplinary actions, on an individual's file. A copy will be given to the individual and they will be told that the record will be retained until they reach statutory retirement age, or for ten years, if that is longer.

### Handling unfounded or unsubstantiated allegations

#### The child

A child who has been the center of unfounded or unsubstantiated allegations of child abuse needs professional help in dealing with the aftermath. The School Counsellor will ensure a professional programme of support. We shall be mindful of the possibility that the allegation of abuse was an act of displacement, making abuse that is actually occurring within the child's own family and/or community. As a School we work to achieve a balance of supporting the child, while challenging the behaviour. While we will work to support the child as much as possible, we also recognize that their behaviour may need to be challenged in line with our Behaviour Policy.

However much support the child may need in such circumstances; we need to be sensitive to the possibility that the aftermath of an unfounded allegation of abuse may result in the irretrievable breakdown of the relationship with the teacher. In such circumstances, we may conclude that it is in the child's best interests to move to another school. We would do our best to help them have as smooth a transition as possible, working closely with the parents or guardians.

#### The member of staff

A member of staff could be left at the end of a unfounded or unsubstantiated allegation of child abuse with severely diminished self-esteem, feeling isolated and vulnerable, all too conscious that colleagues might shun them on the grounds of 'no smoke without fire'. If issues of professional competency are involved, and though acquitted of child abuse, disciplinary issues are raised; we recognise that they are likely to need both professional and emotional help. We will undertake to arrange a mentoring programme in such circumstances, together with professional counselling outside the school community. A short sabbatical or period of retraining may be appropriate.

### Allegation of abuse of a child who is not a student at the School

If we were given information that suggested a member of staff was abusing a child who was not a student of **Grace Project International School**, we would immediately pass such information to the school at which the

child attends, for them to handle. We would then interview the member of staff and formally advise them of the allegations, making it clear that the school would not play any part in the investigatory process. They would be advised of the possibility of facing suspension, reassignment to other duties etc. in exactly the same way as if the allegation had involved a school student. If the allegation subsequently proved to be unfounded, they would be given full support by the school in resuming their career.

#### **Allegations involving the Head or DSL and SCG**

The Chair of Governors should be told at once by the Deputy Head or DSL of any allegation involving the Head. They will obtain legal advice before proceeding to the steps outlined previously. The Head will normally be suspended for the duration of the investigatory process and asked to vacate his school residence, and a Deputy Head would be made acting Head until the conclusion of the investigation and resolution of the issue.

The Head should similarly be told at once of any allegation involving the DSL. SCG should normally be informed on the same day, and legal advice obtained. The DSL will normally be suspended for the duration of the investigatory process and asked to vacate his/her school house. The Head should be made acting DSL until the conclusion of the investigation and resolution of the issue.

## Appendix 2

### Types of abuse, signs of abuse and specific safeguarding issues for St Andrew's School

**Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or by another child or children.

**Physical abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

**Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

**Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

**Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

KCSIE acknowledges the following as specific safeguarding issues:

Bullying including cyberbullying (see Anti bullying policy)  
Children missing education

Child sexual exploitation (See under Child sexual exploitation)  
Domestic violence  
Drugs  
Fabricated or induced illness  
Faith abuse  
FGM (see under Female Genital Mutilation)  
Forced marriage  
Gangs and youth violence  
Hate  
Mental health  
Preventing radicalisation (see under Prevent and Radicalisation)  
Relationship abuse  
Sexting (see E Safety policy)  
Trafficking

In line with KCSIE September 2021, we as a School make staff aware of the risks of Child Sexual and Criminal Exploitation, alongside serious violence. The below text gives an overview of these harms and how to identify children who may be at risk of these harms:

**Child sexual exploitation:**

This is a form of sexual abuse where children are sexually exploited for money, power or status. It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child sexual exploitation does not always involve physical contact and can happen online. A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point.

**Child Criminal Exploitation**

Child criminal exploitation (CCE) takes a variety of forms but ultimately it is the grooming and exploitation of children into criminal activity.

Recently, CCE has become strongly associated with one specific model known as 'county lines', but it can also include children being forced to work in cannabis factories, being coerced into moving drugs (often forced to insert drugs in their vagina or anus in a practice known as 'plugging') or money across the country, forced to commit financial fraud, forced to shoplift or pickpocket.

While County Lines refers to children based in the UK, we must still recognize that our students may be vulnerable and we should be vigilant in recognizing the signs of CCE. These may include: unexplained absence from school, a change in personality, the child exhibiting stress, worry or fear, a child arriving at school with unexplained gifts or expensive items which parents have not provided for them.

**Voyeurism (Offenses Act 2019)**

Is the act of upskirting. This involves the action of placing equipment such as a camera or mobile phone beneath a person's clothing to take a voyeuristic photograph without their permission.

## Children Missing in Education

The School recognises its obligation to track, and if needs be, investigate when students are missing in education. Whilst attendance registers are not a legal requirement in Kenya, the School keeps thorough registration records, so it is able to track easily the number of days a student might miss through the academic year.

Given the full boarding nature of the School, missing education is rare, and tends only to be near the start or end of terms. However, we do recognise our safeguarding responsibility to track and monitor these absences.

To that end, the following steps should be taken when a student is missing from School:

1. Any absence from School is noted on **daily registers** and reported to the School **administration**.
2. If no reason has been given, the School contacts the parents to ascertain the reason
3. The School keeps a record of absences
4. Absences from School are reviewed every term, with any concerning patterns reported to the Head
5. The Head raises concerns with parents, should that be deemed necessary

When a child leaves the school, we will make every effort to ensure they are rehoused in a suitable school and we will pass on relevant Safeguarding information, as requested.

If a child joins us from another school, we will request Safeguarding information to ensure we can provide the student with the best possible support and care.

## FGM (Female genital mutilation)

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in Kenya and a form of child abuse with long-lasting harmful consequences.

It is important that staff are aware of the risks posed to young people in Kenya with regard to Female Genital Mutilation and gender based violence and are consciously active in understanding cultural behaviours, attitudes before holidays and concerns of this nature.

### Signs and Symptoms of Female Genital Mutilation

Difficulty walking, sitting or standing

Spending a longer period of time in the bathroom



Displaying unusual behaviour after being off nursery  
Reluctant to being undressed after having a wet accident  
Long unexplained absences

### Honour based abuse

(HBV) can be described as a collection of practices, which are used to control behaviour within families or other social groups to protect perceived cultural and religious beliefs and/or honour. Female Genital Mutilation (FGM), forced marriages and activities such as breast ironing are all abuse and forms of HBV and should be treated in the same way as any other form of abuse. The school is mindful that its location in East Africa makes it close to 'hot spot' areas risk in terms of HBV and staff are expected to be proactive in passing on any concerns. It is imperative that staff report their concerns to the DSL as a matter of urgency if they suspect a student is particularly vulnerable to FGM.

### Prevent and Radicalisation

Protecting children from the risk of radicalisation is seen as part of the schools' wider safeguarding duties, and is similar in nature to protecting children from other forms of harm and abuse. During the process of radicalisation it is possible to intervene to prevent vulnerable people being radicalised. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media in particular has become a major factor in the radicalisation of young people. As with other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. Staff should use their judgment in identifying children who might be at risk of radicalisation and act proportionately

### Students with special educational needs and safeguarding

The School welcomes students with special educational needs and disabilities and will do all that is reasonable to ensure that the School's curriculum, ethos, culture, policies, procedures and premises are made accessible to everyone.

Additional barriers can exist when detecting the abuse or neglect of students with a special educational need or disability creating additional safeguarding challenges for those involved in safeguarding and promoting the welfare of this group of children. The School will always consider extra pastoral support for children with special education needs and disabilities.

The School is mindful in particular that:

Indicators of possible abuse such as behaviour, mood and injury can relate to the student's special educational need or disability

Students with a special education need or disability can be disproportionately impacted by bullying and/or peer group isolation without outwardly showing any signs

There may be communication barriers which are difficult to overcome to identify whether action under this policy is required.

The use of reasonable force especially relates to children with special educational needs and disabilities.

Where necessary, individual plans for vulnerable children will be draw up to reduce the use of reasonable force.

## Appendix 3

### Early help, recognising a 'Child in Need' and a 'Child at Risk'

With regard to early help in St Andrew's School, we subscribe to the guidance given by UK legislation but are not able to offer the sort of support given through the Common Assessment Framework in the UK. We do recognise that early reporting and help of a child is paramount in the managing of potential needs.

The referral system through CPOMs offers the school the opportunity to notify those relevant people to additional help that may be necessary or deemed as a 'Child in Need'.

We recognise the need for early help through external agencies (or through internal process) to best support the child.

Although the support for children is different in **Uganda** (to the UK) and the official options for Child in Risk and Child in Need is more limited. We do recognise a child who has suffered or is likely to suffer significant harm through emotional ill treatment, physical injury (including Female Genital Mutilation (FGM)), forms of neglect, child sexual exploitation (CSE) and other forms of abuse may lead to students of any age being considered "at risk".

Being alert to the possibility that students may be "at risk" (and knowing how to respond, report and refer) is a responsibility for all staff at **Grace Project International School**. Child Protection concerns are responded to, reported, and referred in the ways this policy describes.

Although some students may have a need for additional support, they may not be considered "at risk" but would be classed (within the UK framework) as "child in need". For some students there may need to be an assessment of risk conducted by the school.

A child may benefit from early help but staff should be particularly alert to the potential need for early help for a child who:

- Is disabled and has specific additional needs
- Is at risk of being radicalised or exploited
- Has special educational
- Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- Is frequently missing/goes missing from home
- Is misusing drugs or alcohol themselves
- Is at risk of modern slavery, trafficking, or exploitation
- Is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse
- Has returned home to their family from care
- Is showing early signs of abuse and/or neglect